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Federal Communications Commission
Office of Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Billed Party Preference for) CC Docket No. 92-77
InterLATA 0+ Calls)

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT) hereby responds to the Commission's Public Notice of October 10, 1996, in the captioned docket. SWBT will first summarize its answers, then restate and underline each question before the response.

SUMMARY

1. Many industries do not provide price disclosure at the point of purchase. Moreover, SWBT has been providing operator services for over 100 years without such disclosure.
2. On demand call rating is no problem. No technology exists, however, to provide call rating for dialed calls which do not involve an operator.
3. SWBT has no information to answer this question.
4. The Commission itself, in the 800 data base docket, No. 86-10, has recognized that unreasonable call delay can degrade consumer service.
5. There is no problem in providing on demand call rating.
6. SWBT has no data to answer this question.
7. Presumably, market based competition will help control rates and encourage more PSPs into the market. Thus, the rationale for BPP will be reduced.

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1. Are there are industries in which price disclosure to consumers at the point of purchase is not the normal practice? If so, what are those industries and what are the particular circumstances surrounding the developments of those industries?

1. Answer: Many industries do not have price disclosure at the point of purchase -- for example: hospitals, ambulance services, water companies, electric companies and towing services. Because of bar coding, consumers may find it difficult to determine grocery prices before the item is registered by the cashier. Also, the Commission should keep in mind that SWBT and others have been in the operator services business for over 100 years without disclosing prices at the beginning of each call. Customers expect to pay a charge for operator service calls. If customers desire to know the price, they can ask, and the operator will explain the rates. The notion of requiring operators to explain rates before each operator-assisted call, whether or not the customer requests it, is like requiring an electric utility to disclose rates before restoring power after a storm. It is neither practical nor useful.

2. What kinds of technologies (including payphone equipment and associated software) are currently available to provide on-demand call rating information for calls from payphones, other aggregator locations, and phones in correctional institutions that are provided for use by inmates? Commenters should discuss the anticipated declining cost of these technologies, assuming a wide-spread demand for these services.

2. Answer: The Commission asks about technology currently available to provide "on-demand" call rating. If a customer calls the operator and requests a rate, the technology is in place within SWBT to quote the SWBT rate for any call within the serving area. Technology is available

in "Smart" sets to provide real-time rate quotation for 1+ coin sent paid calls; however, there is no mechanized system for real-time quotation for 0+ calls.

3. Are there any telecommunications markets outside of the U.S. that already make use of price disclosure prior to call completion, for example, in the U.K.? If so, please provide the technological and financial details behind the implementation of these services and any indication as to the cost and benefits from the perspective of consumers.

3. Answer: SWBT has no information to address this question.

4. Some commenters have claimed that price disclosure prior to call completion would create an unacceptable delay to consumers. Are there any studies that substantiate or dispute this contention and are those studies available? Are there any studies available that provide indications of consumer satisfaction or dissatisfaction with 0+ services provided in this fashion?

4. Answer: The Commission itself recognizes that call delay is an undesirable alternative. For example, in the 800 data base proceeding, Docket No. 86-10, the Commission established very clear and precise call delay standards. The Commission recognized that delaying calls unreasonably would degrade service to consumers.

5. If some or all of embedded base equipment and software are incapable of providing audible notice to consumers for on-demand call rating, what time period would be reasonable for substituting equipment and software that is capable of doing so?

5. Answer: This question again refers to "on-demand" call rating. Rate quotations for such calls are not the problem. If a customer calls an operator and requests a rate, the operator can quote the rate. The problem occurs if the Commission requires rate quotations to be given on 0+ calls even when consumers don't ask for them, or on dialed calls which do not involve an operator.

6. What percentage of interstate 0+ calls do calls from correctional institutions constitute, both in quantity and dollar, over the last 5 years?

6. Answer: The vast majority of inmate calls on SWBT's network are intrastate, intraLATA. SWBT has no data on interstate inmate calls.

7. What effects, if any will the recent Report and Order *In the Matter of Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation*, CC Docket Nos. 96-128, 91-35, FCC 96-388 (released September 20, 1996) have on this proceeding?

7. Answer: Presumably, market based competition will help control rates and encourage more PSPs into the market. Thus, the rationale for BPP will be reduced.

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Certificate of Service

I, Elaine Temper, hereby certify that the Comments of Southwestern Bell Telephone Company on Docket No. 92-77 have been served this 13th day of November, 1996 to the Parties of Record.

A handwritten signature in cursive script, reading "Elaine Temper", is written over a horizontal line.

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